

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

DAVITA M. KEY, )  
                    )  
Plaintiff,       )  
                    )  
v.                 ) CIVIL CASE NO. 2:19-cv-767-ECM  
                    )  
DYNAMIC SECURITY, INC. )  
                    )  
Defendant.       )

**JURY VERDICT FORM**

Do you find from a preponderance of the evidence:

1. That Davita M. Key engaged in protected activity?

a. Answer: Yes: ✓

No: \_\_\_\_\_

If your answer is “No,” this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If your answer is “Yes,” go to the next question.

2. That Dynamic Security, Inc. took an adverse employment action against Davita M. Key?

a. Answer: Yes: ✓

No: \_\_\_\_\_

If your answer is “No,” this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If your answer is “Yes,” go to the next question.

3. That Dynamic Security, Inc. took the adverse employment action because of Davita M. Key's protected activity?

a. Answer: Yes: ✓

No: \_\_\_\_\_

If your answer is "No," this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If your answer is "Yes," go to the next question.

4. That Davita M. Key suffered damages because of the adverse employment action?

a. Answer: Yes: ✓

No: \_\_\_\_\_

If your answer is "No," this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If your answer is "Yes," then go to the next question.

5. That Davita M. Key should be awarded damages to compensate for a net loss of wages and benefits to the date of your verdict?

a. Answer: Yes: ✓

No: \_\_\_\_\_

b. If your answer is "Yes," in what amount? \$ 85,200.00

6. That Davita M. Key should be awarded damages to compensate for emotional pain and mental anguish?

a. Answer: Yes: ✓

No: \_\_\_\_\_

b. If your answer is "Yes," in what amount? \$ 214,864.00

If you did not award damages in response to either Question Nos. 5 or 6, this will end your deliberations, and your foreperson should go to the end of this verdict form to sign and date it. If you awarded damages in response to Question Nos. 5 or 6 (or both), go to the next question.

7. That punitive damages should be assessed against Dynamic Security, Inc.?

a. Answer: Yes: ✓

No: \_\_\_\_\_

b. If your answer is "Yes," in what amount? \$ 511,200.00

SO SAY WE ALL, this the 29<sup>th</sup> day of March, 2023.

William L. Gallagher  
Foreperson